

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

LARRY FLOYD,

Plaintiff,

V.

TRANSUNION CONSUMER SOLUTIONS,

Defendant.

07-cv-7239

Judge Conlon

Magistrate Judge Valdez

SUPPLEMENT TO NOTICE OF REMOVAL

Defendant Trans Union LLC (“Trans Union”), by its attorneys, DLA Piper US LLP, hereby supplements its notice of removal from the Circuit Court of Cook County, Illinois, to the United States District Court for the Northern District of Illinois, Eastern Division under 28 U.S.C. § 1441(b).

1. On December 27, 2007, Trans Union filed its Notice of Removal in this action.

(Docket No. 1.)

2. In its Notice of Removal, Trans Union stated, “Trans Union was served with a copy of the Complaint on December 19, 2007. . . .” Notice of Removal, ¶ 2.

3. During its investigation of Plaintiff's claims, Trans Union discovered that, before serving the Complaint, Plaintiff sent a copy of the Complaint to Trans Union by U.S. Mail on November 27, 2007. Trans Union received this correspondence on November 30, 2007. Plaintiff's correspondence was not directed to Trans Union's legal department or its registered agent. Pursuant to 28 U.S.C. § 1446(b), a copy of this correspondence is attached hereto as Exhibit 1.

4. Trans Union's removal was timely under 28 U.S.C. § 1446(b) because Trans Union filed its notice of removal within thirty days of its receipt of the Complaint on November 30, 2007.

5. Trans Union files this Supplement to ensure that the Court's records are accurate and complete.

Date: January 14, 2008

Respectfully submitted,

TRANS UNION LLC

By: s/ Sharon R. Albrecht
One of Its Attorneys

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Sharon R. Albrecht (ARDC #06288927)
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CERTIFICATE OF SERVICE

I, Sharon R. Albrecht, an attorney, depose and state that on January 14, 2008, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system. I also caused a true and correct copy of the foregoing to be served on the following party at the indicated address by First Class United States Mail:

Larry Floyd
815 North Harlem Avenue
Oak Park, IL 60302

s/ Sharon R. Albrecht
Sharon R. Albrecht